



IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI

DOUGLAS HANDSHOE	)	PLAINTIFF
	)	
v.	)	CIVIL ACTION NO. 1:14CV159 KS-MTP
	)	
DANIEL G. "DANNY" ABEL AND	)	DEFENDANTS
CHRIS YOUNT	)	
	)	

**REQUEST FOR ENTRY OF DEFAULT**

Comes now plaintiff Douglas Handshoe and hereby requests the Clerk to enter a default against the defendant, Daniel G. "Dany" Abel, on the basis that the record in this case demonstrates that there has been a failure to plead or otherwise defend as provided by Rule 55(a) of the Federal Rules of Civil Procedure.

Respectfully submitted this 11th day of December, 2015,

A handwritten signature in blue ink, appearing to be "Douglas Handshoe", written over a horizontal line.

Douglas Handshoe, Pro Se Plaintiff  
Post Office Box 788  
Wiggins, MS 39577  
(601) 928-5380  
[earning04@gmail.com](mailto:earning04@gmail.com)

**CERTIFICATE OF SERVICE**

I, Douglas Handshoe, hereby certify that on December 11<sup>th</sup>, 2015 the foregoing was sent for electronically filing by me via the Clerk of the Court using the ECF system which sent notification of such filing to the following ECF participants:

Chris Yount  
Pro Se  
545 Terrace Street  
Jefferson, LA 70121

I, Douglas Handshoe, certify I have sent a true and correct copy of the foregoing to the following via United States Mail:

Daniel G. Abel  
Pro Se  
C/O The Super 8 Motel / Desai Enterprises  
2421 Clearview Parkway, Room 106  
Metairie, LA 70001

Respectfully submitted this 11<sup>th</sup> day of December, 2015,



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v.	)	<b>CIVIL ACTION NO. 1:14CV159 KS-MTP</b>
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CHRIS YOUNT	)	
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**AFFIDAVIT IN SUPPORT OF REQUEST FOR ENTRY OF DEFAULT**

I, Douglas Handshoe , declare under penalty of perjury that the following facts are true and correct to the best of my information and belief:

1. I am the Plaintiff in this action.
2. A complaint was filed herein on April 10, 2014 and service of process was had on the defendant on June 16, 2014.
3. The first amended complaint was filed herein on March 13, 2015.
4. More than twenty one (21) days have elapsed since the defendant in this action was served, and the defendant has failed to plead or otherwise defend as provided by the Federal Rules of Civil Procedure.

Respectfully submitted this 11th day of December, 2015,

\_\_\_\_\_  
Douglas Handshoe, Pro Se Plaintiff  
Post Office Box 788  
Wiggins, MS 39577  
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[earning04@gmail.com](mailto:earning04@gmail.com)



Sworn before me: Notary *Brian H. Brooks* 12/11/15